

The Honorable Richard A. Jones  
The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

SUMMIT ASSET STRATEGIES  
INVESTMENT MANAGAMENT, LLC, et  
al.,

Defendants,

NO. CV15-1429RAJ

**NOTICE OF RELATED CASE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRIS YOUNG YOO,

Defendant..

NO. CR17-0075TSZ

**NOTICE OF RELATED CASE**

The United States of America respectfully submits the following Notice of Related  
Case pursuant to Local Rule CrR 13(b):

1 On September 4, 2015, the United States Securities and Exchange Commission  
2 (“SEC”) filed a civil complaint alleging that defendant Chris Yoo and entities under his  
3 control engaged in securities fraud in connection with Yoo’s promotion of investment  
4 funds known as Summit Stable Value Fund (“SSVF”) and Summit Strategic  
5 Opportunities Fund I (“SSOF”). The case was assigned to the Honorable Richard A.  
6 Jones. The proceeding was resolved through a settlement, and on November 6, 2015,  
7 Judge Jones entered a final judgment against Yoo and others imposing monetary  
8 penalties and injunctive relief.

9 On March 13, 2017, the United States Attorney filed an Information charging Yoo  
10 with one count of wire fraud in violation of Title 18, United States Code, Section 1343,  
11 and one count of making a false statement to the United States in violation of Title 18,  
12 United States Code, Section 1001. The matter was assigned cause number CR17-0075  
13 and assigned to the Honorable Thomas S. Zilly. Yoo entered a guilty plea on March 20,  
14 2017, and is scheduled for sentencing on June 22, 2017.

15 The criminal charges allege that Yoo engaged in fraud in connection with the  
16 same investment funds (SSVF and SSOF) at issue in the SEC litigation. The wire fraud  
17 charge differs from the SEC’s allegations in that, whereas the SEC alleged that Yoo  
18 misappropriated money from the SSVF and SSOP funds (thereby victimizing clients who  
19 had invested in these funds), the wire fraud charge alleges that, with respect to certain  
20 victims, Yoo failed to even invest his clients’ money in the funds as promised, and  
21 instead spent the money for his own purposes. The false statement charge relates directly  
22 to the SEC litigation, as it arises out of false information Yoo provided to the SEC in  
23 connection with that litigation. Furthermore, the parties have agreed that a sentencing  
24 enhancement should be applied in the criminal case pursuant to USSG § 2B1.1(b)(9)  
25 because the defendant violated a judicial order in the SEC case.

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1       Accordingly, as directed by Local Rule CR13(b), the United States hereby  
2 provides notice to the Court that the two matters captioned above involve common issues  
3 of fact.

4       DATED: March 21, 2017.

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6                   ANNETTE L. HAYES  
7                   United States Attorney

8  
9                   *s/ Seth Wilkinson*  
10                  SETH WILKINSON

11                  Assistant United States Attorneys  
12                  United States Attorney's Office  
13                  700 Stewart Street, Suite 5220  
14                  Seattle, Washington, 98101-1271

**CERTIFICATE OF SERVICE**

I hereby certify that on March 21, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney(s) of record for the defendant(s). (CR17-0075TSZ)

I hereby certify that on March 21, 2017, I filed the foregoing with the Clerk of the Court. (CV15-1429RAJ)

/s/ Kylie Noble  
KYLIE NOBLE  
Legal Assistant  
United States Attorney's Office  
700 Stewart Street, Suite 5220  
Seattle, WA 98101-3903  
Telephone: (206) 553-2520  
Fax: (206) 553-4440  
E-mail: [kylie.noble@usdoj.gov](mailto:kylie.noble@usdoj.gov)